

Rev. 3/19

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

Sinister Daevagasnaham God (Kyntrel Jackson) #355949  
Plaintiff's full name and prisoner number

Plaintiff,

v.

Case No. 3:19-cv-05756-RBL-DWC  
(leave blank – for court staff only)

See attached

PRISONER CIVIL RIGHTS  
COMPLAINT

\_\_\_\_\_  
Defendant's/defendants' full name(s)

Defendant(s).

Jury Demand?

☒ Yes

☐ No

(If you cannot fit all of the defendants' names in the space provided, please write "see attached" in the space above and attach additional sheets of paper, as necessary, with the full list of names. The names listed here must be identical to those in Section II. Do not include addresses here. **Individuals whose names are not included in this section will not be considered defendants in this action.**)

**WARNINGS**

1. Do not use this form if you are challenging the validity of your criminal conviction or your criminal sentence. If you are challenging your conviction or sentence, or if you are seeking restoration of good-time credits that would shorten your sentence, you must file a Petition for Writ of Habeas Corpus. If you use this form to challenge your conviction or sentence, you risk having your claim dismissed. Separate forms are available for filing a habeas petition.

2. Under the Prison Litigation Reform Act ("PLRA"), you are required to exhaust all remedies in your institution's grievance system that are available to you before filing suit. This generally means that you must file a grievance and, if it is denied, appeal it through all available levels of review. Your case may be dismissed if you fail to exhaust administrative remedies, unless the administrative grievance process was not "available" to you within the meaning of the PLRA. You are not required to plead or show that you have exhausted your claim in this complaint.

## Defendants (Caption)

Heidi L. Romero, Patrick E. Brady, Leona L. Irving, Barbara F. Bannan,  
Vance W. Adamire, Ryan A. Pfaff, Steven Sinclair, Casey M. Kaeck, Timothy  
M. Thrasher, Kevin Bowen, Jane/John Does, D. Feist, L. Fletcher, A. Deshev,  
J. Uglick, J. Smith, Douglas Wayne Carr, John Coulter Dittman, & Timothy  
Lang

## I. Request

We wish to update the captioned defendants upon the  
submissions of their full names.

3. Please review your complaint carefully before filing. If your case is dismissed, it may affect your ability to file future civil actions while incarcerated without prepaying the full filing fee. Under the PLRA, a prisoner who has had three or more civil actions or appeals dismissed as frivolous, malicious, or for failure to state a claim cannot file a new action without first paying the full filing fee, unless the prisoner is in imminent danger of serious bodily injury.

4. Under Federal Rule of Civil Procedure 5.2, papers filed with the court, including exhibits or attachments to a complaint, may not contain certain information, which must be modified as follows:

Do not include:

- a full social security number
- a full birth date
- the full name of a minor
- a complete financial account number

Instead, use:

- the last four digits
- the birth year
- the minor's initials
- the last four digits

5. You may, but do not need to, send exhibits, affidavits, grievances, witness statements, or any other materials to the Clerk's Office with this complaint. Any documents you submit *must relate directly to the claims you raise in this lawsuit*. They will become part of the court record and *will not be returned to you*.

## I. PLAINTIFF INFORMATION

Jackson, Kypriel T.  
Name (Last, First, MI)

Sinister Daevayasnam Gad  
Aliases/Former Names

355843  
Prisoner ID #

~~Washington Corrections Center~~ Stafford Creek Corrections Center  
Place of Detention

~~P.O. Box 900~~ 191 Constantine Way  
Institutional Address

Aberdeen  
Shelton  
County, City

WA  
State

98520  
~~98584~~  
Zip Code

Indicate your status:

- ☐ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee

- ☒ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner

**II. DEFENDANT INFORMATION**

*Please list the following information for each defendant. If the correct information is not provided, it could delay or prevent service of the complaint. Make sure that the defendant(s) listed below are identical to those contained in the caption on the first page of the complaint. Attach additional sheets of paper as necessary.*

Defendant 1: Heidi L. Romero  
 Name (Last, First)

Psychology Associate  
 Current Job Title

Clallam Bay Corrections Center  
 Current Work Address

Clallam Bay WA 98326  
 County, City State Zip Code

Defendant 2: Patrick E. Brady  
 Name (Last, First)

Intelligence & Investigations  
 Current Job Title

Clallam Bay Corrections Center  
 Current Work Address

Clallam Bay WA 98326  
 County, City State Zip Code

Defendant 3: Leona L. Irving  
 Name (Last, First)

Counselor  
 Current Job Title

Clallam Bay Corrections Center  
 Current Work Address

Clallam Bay WA 98326  
 County, City State Zip Code



## II. Defendants Continued,

4. Barbara F. Bannan

Unit Manager

Clallam Bay Corrections Center

5. Vance W. Adamire

B-Unit Manager

Clallam Bay Corrections Center

6. Ryan A. Pfaff

CS3

D.O.C Headquarters

Olympia WA, 98504

7. Steven Sinclair

Secretary of Prisons

D.O.C Headquarters

Olympia WA, 98504

8. Casey M. Kaech

Secretary Senior

D.O.C Headquarters

Olympia WA, 98504

9. Timothy M. Thrasher

Chair/Associate Superintendent

Stafford Creek Corrections Center

Aberdeen WA, 98520

10. Kevin Bowen

OCML

D.O.C Headquarters

Olympia WA, 98504

11. Jane Doe #1 C. Stone (pg 3 line 28)

also for burden claim

Mailroom Sergeant

Clallam Bay Corrections Center

Clallam Bay WA, 98326

12. Jane Doe #2 S. Lohenis (pg 3 line 28)

also for burden claim

Mailroom Officer

Clallam Bay Corrections Center

Clallam Bay WA, 98326

13. John Doe #3 (Page 2 Line 27)

I &amp; I

Clallam Bay Corrections Center

Clallam Bay WA, 98326

14. John/Jane Does #4 (page 3 line 5)

Assistant Attorney General/Legal sides

Western AG's Office P.O Box 40116

Olympia WA, 98504

15. D. Feist

CBCA

D.O.C Headquarters

Olympia WA, 98504

16. L. Fletcher

PS4

D.O.C Headquarters

Olympia WA, 98504

## II. Defendants Continued

<p>17. A. Deshev CMHUS D.O.C Headquarters Olympia WA, 98504</p> <p>18. J. Uglick AA2 D.O.C Headquarters Olympia WA, 98504</p> <p>19. J. Smith Project Manager D.O.C Headquarters Olympia WA, 98504</p> <p>20. John Doe #5 J. McCollum (pg. 3 L. 22) C.U.S Washington State Penitentiary Walla Walla WA, 99362</p> <p>21. Douglas Wayne Carr Assistant Attorney General West AG's Office, P.O Box 40166 Olympia WA, 98504</p> <p>22. Timothy Lang Head Assistant Attorney General West AG's Office, P.O Box 40166 Olympia WA, 98504</p>	<p>23. John Coulter Dittman Assistant Attorney General Eastern AG's Office 1116 West Riverside Ave, Ste. 100 Spokane WA, 99201 (pg. 3 Line 5)</p> <p>24. John/Jane Doe #6 (Party Willoughby) Legal Assistant III Eastern AG's Office Spokane WA, 99201</p> <p>25. Jane Doe #7 (Kelli J. McKinney) pg. 3 Line 5 Paralegal to Dittman Eastern AG's Office Spokane WA, 99201</p> <p>26. John Doe #8 (Clinton Gauthier) pg. 3 at 5 Legal Assistant West AG's Office, P.O Box 40166 Olympia WA, 98504</p> <p>27. John Doe #9 (John Thompson) pg. 1 at 28/29 WCC Law Librarian Washington Corrections Center P.O Box 900 Shelton WA, 98584</p> <p>28. John Doe #10 (J. Scott) pg. 3 Line 22 CS3 Washington Corrections Center</p>
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**III. STATEMENT OF CLAIM(S)**

*In this section, you must explain what you believe each defendant did to violate your civil rights, and if you know, identify the federal statutory or constitutional right you believe was violated.*

*If you believe the defendant(s) violated your civil rights in more than one way, explain each violation under a different count. For example, if you believe you received constitutionally inadequate medical care and your religious rights were substantially burdened, include one claim under "Count I" (i.e., medical) and the other claim under "Count II" (i.e., religion).*

*Number your paragraphs. For example, in Count I, paragraphs should be numbered 1.1, 1.2, 1.3, etc., and in Count II, paragraphs should be numbered 2.1, 2.2, 2.3, etc. The first two paragraphs of each Count have been numbered for you.*

*If you have more than three counts, attach additional pages and follow the same format for each count.*

*If you attach documents to support the facts of your claim(s), you must specify which portion of the document(s) (i.e., page and paragraph) you are relying on to support the specific fact(s) of your claim(s). If you do not specify the portion of the supporting document(s), the Court may disregard your document(s).*

**COUNT I**

*Identify the first right you believe was violated and by whom:*

1.1 1<sup>st</sup> Amendment rights to redress government  
without retaliation

*State the facts of your first claim below. Include all the facts you consider important. Be specific about dates, times, locations, and the names of the people involved. Describe exactly what each specific defendant did or failed to do that caused you injury or violated your rights, and include any other facts that show why you believe what happened was wrong. If you need additional space, you may attach extra sheets.*

1.2 (See attached)



## Statement of Facts

I. Preface

I, Sinister Daerayasnaham God (Kyntrel Jackson) wish to pursue a 42 U.S.C 1983 civil rights complaint in concern to the violations of my 1<sup>st</sup> Amendment right to redress government without retaliation against Department of Corrections employees under "Color of State Law", Heidi L. Romero, Patrick E. Brady, Leona L. Irving, Barbara F. Bannan, Vance W. Adamire, Ryan A. Pfaff, Steven Sinclair, Casey M. Kaech, Timothy M. Thrasher, Kevin Bowen, D. Feist, L. Fletcher, A. Desher, Jane/John Does, J. Uglick, J. Smith, & Assistant AG Douglas Carr, John Dittman, & Timothy Lang. The above named violated & or aided the violations of my 1<sup>st</sup> Amendment right to redress government without retaliation, 14<sup>th</sup> Amendment right to due process, & 6<sup>th</sup> Amendment to fair hearing, & the laws of the State of Washington. The disturbance of my rights secured by the 1<sup>st</sup>, 6<sup>th</sup>, & 14<sup>th</sup> amendments were all well known established rights & their intentional hindering violated 18 U.S.C §242 "Deprivation of rights under color of state law" & caused a "Private Nuisance" to my life, legal, & private affairs, also their acts to conspire against my rights is violation of 18 U.S.C §241.

II. Claims

The defendants transferring me soley over my legal actions against Romero & documenting in my record that my legal actions were a fixation, harassing, & posing a threat to Romero without giving me any notice, hearing, due process, appeal process, & or any form of opportunity to dispute the documented claims against me was unconstitutional, & their unconstitutional acts limited/hindered my legal access due to isolation, prolonged my isolation, & put an undue burden in montary expenses on me to pay for the transfer of my property. Their unconstitutional acts against me were atypical & caused me a significant hardship in my daily life, legal activities, mental health, private affairs, & to my financial

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Status.

### III. Statement of Facts

On February 24<sup>th</sup>, 2019 I was placed in Clallam Bay Corrections Center's Intensive Management unit on involuntary status. On March 18<sup>th</sup>, 2019 I was informed to partake in GIR to be released from IMU, & on May 3<sup>th</sup>, 2019 I began GIR which is a 1.5 to 3 month class (Attachment 1). Thus at the latest I would be released from IMU on August 9<sup>th</sup>, 2019 to general population. Sadly this didn't happen due to retaliation against me sans due process over my legal actions against Romero.

On April 28<sup>th</sup>, 2019 I began taking legal action against the CBCC psychology associate Romero pursuant to the Federal Rules of Bankruptcy Procedure by sending her a Notarized & certified "Billing for Damages Notice" & "Affidavit of Billing" which continued to "Notice of Default", "Affidavit of Default", "Notice of Foreclosure" & "Affidavit of Foreclosure" (Attachment 2) in concern to illegal acts against me on April 16<sup>th</sup>, 2019 by Romero. From April 16<sup>th</sup>, 2019 to the present date I never spoke with, talked to, looked at, disrespected, & or threatened Romero & even before April 16<sup>th</sup>, 2019 our contact was limited but respectful. (I wish to point out that my legal bankruptcy case is a separate claim & is only being used to prove 1<sup>st</sup> amendment retaliation)

After I sent the "Notice of Billing" to Romero, she began to slander my character & retaliate against me by having Bannan & Brady pull out my witnesses (Attachment 2) & threaten, intimidate, & tamper with them by telling them they would be charged with extortion for their declarations in support of me. On May 23<sup>rd</sup>, 2019 Romero had Brady & John Doe pull me out & threaten to infract me for my legal bankruptcy proceedings against Romero unless I stopped. I clearly refused to seize my legal actions under threat as to their actions



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were a clear violation of state law R.C.W. 43.60.220, R.C.W. 3A.72.120, & R.C.W. 3A.72.110 (Attachment 3).

On June 6<sup>th</sup>, 2019 a meeting was held against me (I was never notified of this hearing until July 19<sup>th</sup>, 2019) by Irving, Brady, Bannan, & Romero with input from Carr, Dittman, Lang, & Jane/John Does & submitted to Adamire on June 10<sup>th</sup>, 2019 where they all decided that my legal actions against Romero were "a threat to the secure operation of CBCC-IMU-F(IMS)" & that I was "fixated on & is harassing a CBCC staff member", "displaying a fixation on a staff", & "Fixated on a staff member" (Attachment 4). I was then retaliated against & removed involuntarily from GIR & transferred to Washington Corrections Center on June 12<sup>th</sup>, 2019 & placed in isolation on hold for 38 days solely because my legal actions.

I was not aware of the meetings & decisions made against me in lines 3 to 13 of this page. Thus I was given no notice, hearing, & or opportunity to dispute/appeal/grieve the retaliation against me at all. Their decisions named & documented that I was fixated, a threat & harassing a staff member due to my legal actions & thus transferred me <sup>to</sup> a different facility to completely re-start GIR & prolonging my stay in IMU.

Finally on July 19<sup>th</sup>, 2019 it was decided by Pfaff, Kaech, Thrasher, Sinclair, Bowen, Jane & John Does, Feist, Fletcher, Smith, Deshev, Uglick, with input from Carr, Dittman, & Lang that I posed a threat, to CBCC over my legal actions. I was denied any form of hearing, due process, or appeal to defend myself against the documented claims that I was fixated on, harassing, & posed a threat to a CBCC staff member over my legal actions.

All normal forms of appeal & due process that normal prisoners receive were denied to me. The grievance process

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was denied to me as to D.O.C considers facility transfers a classification <sup>issue</sup> & non grievable. I had a similar issue in my grievance 19671601 (Attachment 5) where grievance coordinator Joni Aiyehu stated "Your housing is a classification decision & can't be grieved". Yet the Classification appeal process was denied to me as to I did attempt in good <sup>faith</sup> to appeal the CFP on July 23<sup>rd</sup>, 2019 & recieved a response from CC3 Albertson stating "Offenders can appeal Custody assignment, NOT facility placement." (Attachment 6). Although denied I did also continue in good faith to attempt the appeal process by appealing to Classification & Case management at HQ. (Attachment 7)

#### IV. Arguement

So the defendants in this litigation claimed that I was fixated & harassing Romero over my legal actions & thus posed a threat. They gave me no way to dispute their claims that they used to punish me by transfer. In case Brown V. Platt, 131 F.3d 163 (D.C. Cir. 1997) they state that it is a constitutional violation for prisons failure to follow fair procedures. It connects to my case as to not only did the defendants fail to provide me & or follow fair procedures, they used my legal actions in pretextual context to transfer me without any procedures.

Courts have ruled in Palmer V. Richards, 364 F.3d 60 (2<sup>nd</sup> Cir. 2004) that a prisoner held 77 days under aggravated conditions was harsh & unconstitutional. Similar rulings were made in Gillis V. Litscher, 468 F.3d 435 (7<sup>th</sup> Cir. 2006), & Mitchell V. Horn, 318 F.3d 523 (3<sup>rd</sup> Cir. 2003). It connects to me as to I was transferred to WCC & put on hold in isolation for 38 days stright & than held in isolation passed my intended released date of August 9<sup>th</sup>, 2019 to present, due to the prolonging the unconstitutional transfer caused on my stay in IMU.

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The court ruled in Abbott v. Latshaw, 264 F.3d 141, 147-48 (3<sup>rd</sup> Cir. 1998) "[A]n otherwise private person acts under color of state law when engaged in conspiracy with state officials to deprive another of federal rights". This connects to my case as <sup>to</sup> by the AAG Dittman, Carr, Lang, & Jane/John Does being involved, providing input, & finally coming to the mutual understanding with state officials to do the unconstitutional transfer, which is conspiracy.

In cases C11-05623-RBL-KLS Silva V. McKenna, (9<sup>th</sup> Cir. 2012) Lexis 67791 & C12-05924-BHS-KLS Silva V. McKenna, 2013 U.S. Dist. Lexis 72049 (9<sup>th</sup> Cir. 2013) Douglas Carr & Timothy Lang with Rep. John Dittman had legal action taken against <sup>them</sup> by a prisoner named Matthew G. Silva for unconstitutional transfers due to Silva's legal actions in violation of his 1<sup>st</sup> Amendment right to redress grievances to government without retaliation. Both cases resulted in them paying <sup>in</sup> settlement agreement for a stipulated dismissal. These cases relate to my case as to it shows a history of Carr, Dittman, & Lang's involvements to retaliate against prisoners who know the law. Although not mentioned in both the Silva V. McKenna cases, it also shows Douglas Carr's, Timothy Lang's, & John Dittman's conspiracy with state officials to violate rights on multiple occasions.

Courts also stated that defendants bear the burden of proving the availability of an administrative remedy & the inmate's failure to exhaust that available remedy (See Albino, 747 3d at 1172 Brown, 422 F.3d at 936-37). This <sup>is</sup> important to my case as to even though I attempted to exhaust my administrative remedies within, they were made unavailable to me & thus I was unable to exhaust them although attempted in good faith to do so, in (Attachment 6) & (Attachment 7). The plaintiff even filed a grievance on this issue specifically to be sure & on July 30<sup>th</sup>, 2019 received a response on grievance 13683388 stating "Facility placement is a classification action & is not grievable." (Attachment 8).



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Courts ruled in cases Ayers V. Ryan, 152 F.3d 77 (2<sup>nd</sup> Cir. 1998), Taylor V. Rodriguez, 238 F.3d 188 (2<sup>nd</sup> Cir. 2001), & Hatch V. District of Columbia, 184 F.3d 846 (D.C. Cir. 1999) that there were due process violations when prisoners were disciplined without the chance to get (1) witness testimony (2) have a hearing, & (3) present evidence. These connect to my case as to I was punished for my legal actions that the defendants claim was fixation, harassment, & threatening & disciplined me by transfer. I recieved no hearing, was allowed no witness testimony & denied to present evidence.

The Supreme Court held in Wilkinson V. Austin, 545 U.S. 209 (2005) that even in transfers, prisoners need to get a notice & an opportunity to challenge their transfer. This connects to my case as to I was denied both a notice of transfer & an opportunity to challenge the unconstitutional transfer.

Courts ruled in Allan V. Seiverling, 229 F.3d 220 (3<sup>rd</sup> Cir. 2000) that a prison cannot transfer prisoners or punish prisoners for complaining or to keep prisoners from filing legal action & that prison officials must not use transfers or segregation to restrict their access to the court. This case relates to mine as to I was transferred for my legal actions "complaining" & they used segregation to restrict my access to the courts as to in isolation I can only get 50 sheets of paper a month for personal & legal with no way to receive additional legal paper, denied a type writer, & denied to be present for legal copies/scans.

Courts ruled in Clegget V. Pate, 223 F. Supp. 818 (N.D. Ill. 1964) that prisoners cannot be put into administrative <sup>segregation</sup> solely to punish them for filing legal action. In Thaddeus-X V. Blatter,

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175 F.3d 378 (6<sup>th</sup> Cir. 1999) it states a prisoner cannot be transferred to punish them for filing legal action, whether for yourself, or for someone else. These cases relate to mine as to I was put on hold in isolation at WCC solely over punishment for my legal actions. I was also transferred from CBCC to WCC to punish me over my legal actions.

The Court ruled in Arnold v. IBM, 637 F.2d 1350, 1355 (3<sup>rd</sup> Cir. 1981) that a person must have caused or personally participated in causing the constitutional violations. This connects to my case as to all the defendants were directly involved, participated in, & or aided the violations of my constitutional rights.

### V. Conclusion

Due to all the above claims, statement of facts, & arguments Romero, Brady, Bannan, Irving, Adamire, Pfaff, Sinclair, Kaeck, Thrasher, Bowen, Feist, Fletcher, Deshev, Jane/John Doe, Uglick, Smith, Carr, Dittman, & Lang violated my 1<sup>st</sup> Amendment right to redress government without retaliation, 6<sup>th</sup> Amendment right to a fair hearing, 14<sup>th</sup> Amendment right to due process, & State law R.C.W 43.60.030 "Freedom from discrimination - Declaration of Civil Rights". Their disturbance of my rights secured by 1<sup>st</sup>, 6<sup>th</sup>, & 14<sup>th</sup> Amendment & violations of R.C.W 43.60.220 "unfair practice to aid violation" & 18 U.S.C § 241 "Conspire against rights" all contributed to both a private nuisance & nuisance under R.C.W 7.48.120, deprivation of rights under the color of state law & showed deliberate indifference & negligence to my constitutional rights.

Thus my well known & established rights were violated with wrongful intentions/motives & I thus respectfully move



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to name Heidi L. Romero, Patrick E. Brady, Leona L. Irving, Barbara F. Bannan, Vance W. Adamire, Ryan A. Pfaff, Steven Sinclair, Casey M. Kaeck, Timothy M. Thrasher, Kevin Bowen, D. Feist, L. Fletcher, A. Desher, Jane/ John Does, J. Uglick, J. Smith, Douglas Wayne Carr, John Coulter Dittman, & Timothy Lang as defendants in this matter.

### VI. Additional Claims

Pursuant to Rule 15 (d) of the Federal Rules of Civil Procedure, I wish to retain the right to amend this complaint upon the receipt of new evidence directly related to the underlining claims of this litigation.

Attachment 1

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GIR time schedule - 1 page

**CBCC IMU PROGRAMS**

(ITP) Intensive Transition Program	(CBCP) Cognitive Behavioral Change Program	(MRT) Moral Recognition Therapy	(GIR) Getting It Right
Up to 10 Months (3 Phases)	3 Months	3 Months	1.5 to 3 Months
ITP is a program developed to target offenders that have been assigned Max Custody numerous or extended periods. ITP has three stages. First stage begins in the IMU, second stage transitions into a unit where offenders interact with each other, third stage prepares offenders for release into a general population setting. At each level they receive sequenced interactive classes oriented toward breaking counterproductive cycles.	CBCP is a therapeutic class that helps offenders learn more about themselves, their thoughts, feelings and behaviors and how they interact with each other. The program goal is to enable offenders to recognize negative thoughts, how they resulted with the offender being housed in IMU and how to make better decisions and choices.	MRT is an EBP that guides the participant in the discovery of personal, social, spiritual, and relational goals. MRT guides the participant in development of short, medium and long term goals. Graduates can leave the program with a tangible path and hope for a different future.	GIR is a CBT (Cognitive Behavior Therapy) interactive journaling program. The program is divided in to six sections and adaptable to the offender's circumstances. Program addresses thinking errors to life management to community involvement.
<ul style="list-style-type: none"> <li>• Maximum Custody</li> <li>• Level 3 or Higher</li> <li>• Desire to change.</li> <li>• No involvement with STG during the program.</li> <li>• No significant MH disabilities.</li> <li>• Several prior Max Custody assignments preferred.</li> </ul>	<ul style="list-style-type: none"> <li>• Maximum Custody</li> <li>• Level 3 or higher</li> <li>• Approval by MH facilitator.</li> </ul>	<ul style="list-style-type: none"> <li>• Maximum Custody</li> <li>• Level 3 or Higher</li> <li>• Capacity to learn and apply information.</li> <li>• Advance through the levels while participating in the program.</li> </ul>	<ul style="list-style-type: none"> <li>• Maximum Custody</li> <li>• Level 3 or Higher</li> <li>• Demonstrated capacity to learn.</li> </ul>

• Education available: Adult Basic Education, GED, Transitional Studies including pre-college math, English and reading.

Attachment 2

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Legal action against Romero - 19 pages

Billing for Damages Notice

Mrs. Heidi Romero,

April 28<sup>th</sup>, 2019

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This notice of Billing invoice is being presented to you, as to you have illegally & criminally damaged me in your failure to intercede in stopping an assault against me, your harassment, discrimination, & verbal abuse. Thus I am billing your personal & you individually for the damages you have caused me to suffer as accordingly.

1. On April 16<sup>th</sup>, 2019 around noon I was being assaulted by a Department of Corrections officer at CBCC in F-Unit to the point where I felt suicidal. I notified my attacker that I felt suicidal & he informed you as to you are the Mental health professional for E & F-Unit. I informed you that I was suicidal due to continuance assault by the officer in the booth. You were then on notice & had knowledge of me being assaulted & failed to prevent & or stop the assault. Instead you began to harass me & told me that even though your mental health that you don't deal with mental health issues. I continued to tell you that I felt suicidal & needed help. You told me to deal with my own problems & that the officer who <sup>you</sup> knew was assaulting me would be working for 16 hours. I <sup>asked</sup> ~~ask~~ you if you were knowingly going to allow the officer to assault me for 16 hours straight & you responded "Yes". I then told you that I would bill you for your abuse as to as I am in state confinement under your care you knowing allowed me to continuously be assaulted in your care. You then became physically mad towards me & started harassing me for being suicidal & encouraging me to commit suicide. You then talked about my active lawsuit & PREA investigation (about me being repeatedly sexually assaulted by an officer named Anthony Gonzalez at W.S.P). You exploited me being



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sexually assaulted in violation of R.C.W 4.16.340 in your attempt to belittle me by yelling at the top of your lungs so everyone could hear you. I then told you I would call PREA on you for violating my confidentiality rights. You then yelled "Yeah, Fuck you" & stormed away from door & off the tier & charged me \$4 for being suicidal. Your failure to intercede in an active assault on me while I was in your care, harassment, verbal abuse/torture, slander of character, mental & ~~verbal~~ emotional abuse, violation of confidentiality, unethical conduct, violation of R.C.W 4.16.340, 5.60, 060, 18.225, 090, 18.130, 160. (in concern to your failure to re-train after your illegal damage on Daniel J. Perez), exploitation, & intentional infliction of emotional harm, & attempted murder for intentionally encouraging me to commit suicide. You owe me \$765,000 in damages for these damages.

For all these damages you caused against me, you owe me a total balance of \$765,000 with accordance to the uniform commercial code. I am giving you 30 days from the date of this letter to pay your debt in full. If you fail to pay your debt an affidavit of default will be issue against you. After that your refusal to pay will cause me to enter an affidavit of foreclosure 7 days later. If you continue to refuse to pay the debt then as notice you will force me to file an involuntary bankruptcy petition against you under chapter 7 in the United States Bankruptcy court.

By failure to pay & or negotiate with me will constitute your tacit agreement of the waiver of all

immunity & consent to adjudication by jury trial in  
bankruptcy court.

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I, Kyntrel Trevyone Jackson/Sinister  
Daevayasnaham God swear under oath with the  
penalty of perjury that all the above is true &  
correct.

To:

From: Kyntrel Jackson/Sinister Daevayasnaham God

Date: April 26<sup>th</sup>, 2019

RE: Declaration of Robert Blevins # 324304

I, Robert Blevins hereby declare:

On 4-16-19, at Clallam Bay Corrections Center in the IMU around 12pm in the afternoon, I overheard inmate Sinister down stairs in 5 house in Green pool, declare a suicide emergency. I'm in 6 house upstairs and was able to hear mental health Heidi Remero yell at the top of her lungs as she was harassing Sinister about being suicidal, I was able to hear Remero state that she would allow the C/O in the booth to continue to assault him. Inmate Sinister told Remero that she would "bill" her for not protecting him. At that moment, Remero began harassing him about being sexually assaulted in Washington State

Penitentiary. Inmate Sinister made it aware to Remero, that she violated his patient confidentiality act. After words I heard Remero scream "Fuck off" as she left the tier. I Robert Blevins Doc # 324304, felt overwhelmed over the situation that happened and made it aware I was in need of Mental Health as I



declared I was feeling suicidal cuz I was abused at Washington State Penitentiary and feared for my safety in Clallam Bay Corrections Center. I talk to Romero and she has C/O's place me back in my cell.

At 6:15 pm I go to outside yards where I experience mental Health break down where I urinated in outside yard. After my yard is up, I made it clear to C/O that I'm feelin suicidal... nurse evaluates me and decided I need to go the COA.

I Robert Blivins Doc # 324304 declare that these facts are true.

Robert Blivins

# 324304

*Robert Blivins*

4-20-19

4:30 pm

To:

From: Kyntrel Jackson/Sinister Daevayasnaham God

Date: April 26<sup>th</sup>, 2019

RE: Declaration of Daniel Jarvis #839117

I, Daniel Jarvis hereby declare:

" On Tuesday, April 16<sup>th</sup>, 2019 at/for around noon I inmate Daniel T. Jarvis #893117, housed in Clallam Bay Corrections Center's Intensive Management units in cell G-10 of F-unit was sitting in my cell reading my book when I heard inmate Kyntrel Jackson down in cell G-05 of F-unit declare a suicide emergency. Awhile later I heard the pod doors to G and H tiers of F-unit open so I got up and witnessed and heard the Mental Health lady come onto the tier, I know her to be Heidi L. Romero. I then heard Mr. Jackson speak with Ms. Romero, telling her he felt suicidal because he was being assaulted by the booth officer. I myself then looked towards the booth to see if I could see who was working in the booth but could not see who it was clearly enough to identify the officer. As I continued to listen I then heard Ms. Romero tell Mr. Jackson that ~~she does~~ not deal with mental health problems and began arguing with Mr. Jackson about that on what she does and does not deal with. I then heard Mr. Jackson express his worries about the issue with the booth officer and re explain the situation to her again and heard him say that if she fails to help him or protect him that he will bill her. I then heard Ms. Romero's voice raise even louder than it already was saying that she didn't care what the fuck he did, that it wouldn't work and that the current



if the officer was assaulting him or not. I also then heard Ms. Romero try and urge Mr. Jackson to go on ahead and kill himself, as well I heard her start to harass him about his mental health issues, going so far as to harass him about being sexually assaulted at Washington State Penitentiary and was laughing about it afterwards.

I then heard Mr. Jackson get upset saying he'd file P.R.E.A. on Ms. Romero for violating his rights of confidentiality. After that I heard Ms. Romero get extremely mad at him, I then heard a bang, as though someone had hit a door, which I assumed was Ms. Romero hitting Mr. Jackson's door, and heard Ms. Romero yell "Fuck you you little piece of shit you can't file P.R.E.A. on me, I haven't touched you, so it's not going to work, so go ahead and kill yourself no ones going to come help you". I then heard and observed Ms. Romero storm off the tier and on the doors of Units G and H tiers. Ms. Romero was being pretty loud during this whole interaction with inmate Jackson, yelling most of this all out at the top of her lungs in the presence of all the inmate prisoners on G and H tiers of Unit, not at all being careful to keep her interaction with inmate Jackson private or in any way confidential being so indiscreet to the point that I myself could hear pretty much the whole conversation down in my cell at the end of the tier in the corner in cell G-10 of Unit while this was taking place. I personally have been here at Clallam Bay Corrections Center in the Intensive Management units on Inmate program status for some time now and every interaction I've had with Ms. Romero, she has shown little care for her interaction with inmates, she personally has been rude to me, having a short temper and attitude and when talking with me it always seems like she's trying to rush me, she never takes notes of issues I express to her during her walk through cell front visits and I have to continually repeat myself as if she's not fully paying attention. Most all of my personal interactions with Ms. Romero have been negative and honestly believe someone with such a poor attitude should not work in a position where it's their job to be sympathetic and care for other individuals state of mental health.

Daniel T. Jarvis #893117  
1/1/2020

LEGAL MAIL

# Affidavit of Billing

You, Heidi L. Romero have incurred the following debt of \$765,000. I do hereby swear & affirm that the above debtor owes me for the attached damages & I give the same debtor 30 days to pay this debt as it is due. Failure to pay will result in a affidavit of default, foreclosure, & then an involuntary bankruptcy petition.

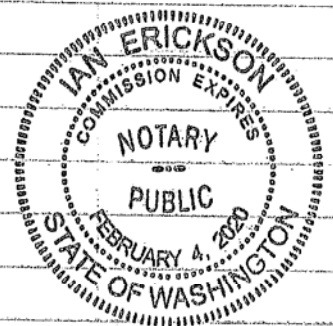
I swear under oath with the penalty of perjury that the foregoing is true.

Signed by:

Sinister Daevayasnam God  
Kyrreil T. Jackson

Notarized by:

Ian Erickson  
My commission date expires:  
2/4/2020



Date:

4/28/19

7015 1520 0000 9149 3597

U.S. Postal Service <sup>®</sup>		CERTIFIED MAIL <sup>®</sup> RECEIPT		F605	
Domestic Mail Only		Jackson 355949			
For delivery information, visit our website at <a href="http://www.usps.com">www.usps.com</a>					
CLALLAM BAY, WA 98326		0510		05	
Certified Mail Fee	\$3.50				
Extra Services & Fees (check box, add fee as appropriate)					
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00				
<input type="checkbox"/> Return Receipt (electronic)	\$0.00				
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00				
<input type="checkbox"/> Adult Signature Required	\$0.00				
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00				
Postage	\$0.70				
Total Postage and Fees	\$4.20			04/29/2019	
Sent To Heidi Romero					
Street and Apt. No., or PO Box No. 1830 eagle crest way					
City, State, ZIP+4 <sup>®</sup> Clallam Bay WA 98326					
PS Form 3800, April 2015 PSN 7530-02-000-9001 See Reverse for Instructions					



Mrs. Heidi Romero

May 27<sup>th</sup>, 2019

I, Sinister Daevayasnaham God/Kyntrei Jackson hereby declare & affirm that you owe me \$765,000. You had until May 27<sup>th</sup>, 2019 to pay the debt & you have not paid your debt as it becomes due. Therefore you are hereby in default.

I, swear under oath with the penalty of perjury that all the above is true & correct.

Cordially,

Sinister Daevayasnaham God  
Kyntrei T. Jackson

P.S.

Pursuant to state law R.C.W. 60 title page if you refuse to provide with the FMV (Fair Market Value) of all your personal property before I file foreclosure & a lien against you for failure to pay your debt will force me pursuant to RCW 60.42.010 to place a FMV on your personal property as I see fit.

Lastly is pursuant to Uniform Commercial Code 62A.9A I claim priority over all other existing possessory liens against you unless debt is owed by you to the IRS & only then if the IRS has served you a bill before April 28<sup>th</sup>, 2019.

LEGAL MAIL

## Affidavit of Default

You, Heidi L. Romero have incurred the following debt of \$765,000. I do hereby declare, swear, & affirm that the above debtor owes me for damages & had 30 days from April 28<sup>th</sup>, 2019 to pay her debt. The above debtor has refused to pay her debt or negotiate payment as it became due. Your failure to pay your debt caused me to file default against you. Failure now to provide me with the FMV's of your property will result in a affidavit of foreclosure (& lien) in 7 days & then an involuntary bankruptcy petition.

I swear under oath with the penalty of perjury that the foregoing is true.

Signed by:

Sinister Daevayasnaham God  
Kyntrel Trevyone Jackson

Notarized by:

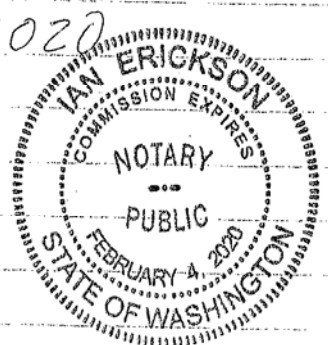
Ian Erickson

My commission date expires

~~5-28-19~~ <sup>IF</sup> 5-2-2-4-2020

Date:

5-28-19



7015 1520 0000 9149 3665

<b>U.S. Postal Service™</b> <b>CERTIFIED MAIL® RECEIPT</b> Domestic Mail Only		<i>Tackson</i> <b>FBI</b> 355949
For delivery information, visit our website at <a href="http://www.usps.com">www.usps.com</a>		
<b>CLALLAM BAY, WA 98326</b>		
Certified Mail Fee \$3.50 Extra Services & Fees (check box, add fee as appropriate) <input type="checkbox"/> Return Receipt (hardcopy) \$0.00 <input type="checkbox"/> Return Receipt (electronic) \$0.00 <input type="checkbox"/> Certified Mail Restricted Delivery \$0.00 <input type="checkbox"/> Adult Signature Required \$0.00 <input type="checkbox"/> Adult Signature Restricted Delivery \$0.00	Postage \$0.55 Total Postage and Fees \$4.05	0510 03 Postmark Here 06/03/2019
Sent To <i>Heidi Romero</i> Street and Apt. No., or PO Box No. <i>1830 Eagle Crest Way</i> City, State, ZIP+4® <i>Clallam Bay WA 98326</i>		
PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions		



Heidi L. Romero,

June 3<sup>rd</sup>, 2019

You, Heidi Romero are hereby now in foreclosure & I am forcing you into involuntary bankruptcy because you refuse to pay your debt. I will be filing a U.C.C.-1 Lien on you with the WA Department of Licensing to collect property & notifying the Clallam county auditor, recorder, & treasurer of your refusal to pay debt owed.

I, Sinister Daevayasnaham God/Hyntrel Jackson swear under oath with the penalty of perjury that all the above is true & correct.

Heidi L. Romero,

June 9<sup>th</sup>, 2019

I do hereby swear & affirm that the above debtor owes me \$765,000 & has failed to pay debt, negotiate debt payment, refused to respond to any & all bills sent to her via certified mail including default notice. All bills/default notices & affidavits were notarized before sent to the above debtor. The above debtor has been aware of her debt since around April 28<sup>th</sup>, 2019.

I swear under oath with the penalty of perjury that the foregoing is true.

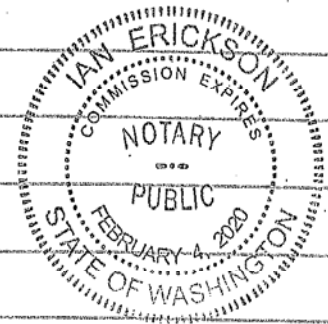
Signed:

Sinister Daevayasnaham God  
Kyntrel Trevyone Jackson

Notarized:

Ian Erickson

My Commission date expires:

2/4/2020

Date:

6/9/19

7015 1520 0000 9149 3702

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**CLALLAM BAY, WA 98326**

Certified Mail Fee \$ **3.50**

Extra Services & Fees (check box, add fee \$0.00 each)

<input type="checkbox"/> Return Receipt (hardcopy)	\$ <b>0.00</b>
<input type="checkbox"/> Return Receipt (electronic)	\$ <b>0.00</b>
<input type="checkbox"/> Certified Mail Restricted Delivery	\$ <b>0.00</b>
<input type="checkbox"/> Adult Signature Required	\$ <b>0.00</b>
<input type="checkbox"/> Adult Signature Restricted Delivery	\$ <b>0.00</b>

Postage \$ **0.55**

Total Postage and Fees \$ **4.05**

Postmark Here **06/10/2019**

Sent To **Heidi Romero**  
 Street and Apt. No., or P.O. Box No. **1830 Eagle Crest Way**  
 City, State, ZIP+4® **Clallam Bay WA 98326**

PS Form 3800, April 2015 PSN 7530-02-000-9001 See reverse for instructions

*2201 Jackson*



Heidi L. Romero,

May 28<sup>th</sup>, 2019

LEGAL MAIL

This notice of billing invoice is being presented to you, as to you have violated the law & damaged me & others with retaliation, threats, intimidation, & pretextual charges. Thus I am billing you accordingly for the damages you have caused me to suffer.

1. On May 3<sup>th</sup>, 2019 (with confidential records concerning mental health & sexual assault that you released without good faith) you had I & I pull out witnesses who wrote declarations against you & intimidate/threaten them that if what they said was true then you would charge them with extortion & other things including falsifying documents. They were informed that if they changed their statements & claimed that I handwrote them or told them word to word what to write, that they would not be charged. Rather than have I & I ask the witnesses what occurred to see if what they said would be consistent with the confidential records you wrongfully released that they wrote, you instead had I & I threaten, infract, charge, take away their privileges, & other intimidation tactics if they did not change their statements to help you. Then on May 23<sup>rd</sup>, 2019 you had I & I pull me out & threaten to infract for billing you pursuant to law & for talking about my issue with you on April 16<sup>th</sup>, 2019 to other people although everyone heard you yelling at me, & then having them write willing declarations on the illegal activity you committed on April 16<sup>th</sup>, 2019. I & I informed me that because their (witnesses) declarations

LEGAL MAIL

were all similar to what we all wrote, that I must have told the witnesses what to write word for word. Yet this is false as to we all wrote what occurred on April 16<sup>th</sup>, 2019 in our own words on the same exact issue, so clearly we all had similar information in our statements. Also you violated multiple state laws by releasing mental health & PREA records to non mental health individuals without just cause. Lastly is you infringed me for taking legal action against you in violation of the 1<sup>st</sup> amendment right to redress government officials without retaliation. You did this as an abuse of power in hopes to stop my legal actions against you. Your harassment, retaliation, threats, infractions, private nuisance, tampering with multiple witnesses, releasing confidential records, intimidation, unethical conduct, tortious conduct, threatening & intimidating a witness, slander of character, violation of numerous mental health laws, & first amendment violations toward me & witnesses. You owe me monetary damages in the amount of:

- A. \$35,000 for harassment
- B. \$17,000 for retaliation
- C. \$50,000 for threats against me
- D. \$175,000 for false infractions
- E. \$27,000 for private nuisance
- F. \$50,000 for tamper with witness Daniel Simms
- G. \$50,000 for tamper with witness Daniel Jarvis
- H. \$50,000 for tamper with witness Robert Blevins
- I. \$75,000 for releasing confidential records
- J. \$19,000 for intimidating me
- K. \$4,743 for unethical conduct
- L. \$23,000 for tortious conduct

- M. \$100,000 for threatening & intimidating witness Daniel Simms
- N. \$100,000 for threatening & intimidating witness Daniel Jarvis
- O. \$100,000 for threatening & intimidating witness Robert Blevins
- P. \$6,781 for slander of character
- Q. \$39,000 for violation of RCW 18.225
- R. \$75,001 for violating the 1st amendment

For all these damages you caused against me & my witnesses, you owe me a total balance of \$1,001,525 in accordance to the Uniform Commercial Code. I am giving you 30 days from the date of this bill to pay your debt in full. If you fail to pay your debt an affidavit of default will be issued against you. After that your refusal to pay debt will cause me to enter an affidavit of foreclosure 7 days later. If you continue to refuse to pay the debt then as notice you will force me to file an involuntary bankruptcy petition against you under chapter 7 in the U.S Bankruptcy court.

By failure to pay & or negotiate with me will constitute your pact agreement of the waiver of all immunity & consent to judgement by jury trial in bankruptcy court.

I, Kyntriel Jackson/Sinister Daevaygnaham  
God swear under oath with the penalty of perjury  
that all the above is true & correct.



LEGAL MAIL

Affidavit of Billings

You, Heidi L. Romero have incurred the following debt of \$1,001,525. I do hereby swear & affirm that the above debtor owes me for the attached damages & I give the same debtor 30 days to pay this debt as it is due. Failure to pay will result in an affidavit of default, foreclosure, & then an involuntary bankruptcy petition.

I swear under oath with the penalty of perjury that the foregoing is true.

Signed by:

Sinister Daevayasnam God  
Myrtrel Jackson



Notarized by:

Ilan Erickson

My commission date expires  
2-4-2020

Date:

5-28-19

Attachment 3  
State Laws

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Attachment 4  
Transfer Plan/CFP - 4 pages



**State of Washington  
Department of Corrections**

**Custody Review  
Offender Version**

**Assigned Counselor:** Bannan, Barbara F

**Printed By:** Scott, Jeremy P

**Print Date:** 07/19/2019

**Inmate: JACKSON, Kyntrel Trevyone (355949)**

Gender: Male	DOB:	Age: 23	Category: Regular Inmate	Body Status: Active Inmate
RLC: HV			Custody Level: Maximum	Location: CBCC-IMU — F / FB01L
ERD: 07/06/2029				CC/CCO: Bannan, Barbara F

**Purpose of Review**

Purpose Of Review	Date Initiated
Plan Change	06/06/2019
Transfers	06/06/2019

**Program Needs**

Education				Grade Point Equivalency	
<b>GED/HSD:</b>	<b>Date Obtained:</b>	<b>Location:</b>	<b>Verified?</b>	<b>Math:</b>	<b>Reading:</b>
GED	02/14/2018	DOC	N	6th	9th

**Offender Needs (Needs Assessment Tool)**

SEXUAL DEVIANCY  
EDUCATION  
COMMUNITY EMPLOYMENT  
MENTAL HEALTH  
FRIENDS  
ALCOHOL / DRUG USE  
RESIDENTIAL  
COPING SKILLS  
AGGRESSION  
ATTITUDES / BEHAVIORS

**Program Narrative**

Narrative:

GCT Restoration Pathway Researched. Offender Has Lost The Following GCT: 5/4/2012 633 (60-Days); 9/27/12 508,600 (30-Days); 9/28/12 506,659 (60-Days); 3/19/13 554, 892 (90-Days); 2/1/2014 356,554,600 (30-Days); 3/30/14 734 (45-Days); 3/30/14 633 (60-Days); 10/6/14 506 (30-Days); 4/25/16 602 (30-Days) Not Eligible For 5 Years; 7/11/16 602 (60-Days) Not Eligible For 5 Years And 7/21/16 704,717 (60-Days) Not Eligible For 5 Years; 1/30/2019 633 (30 Days). Offender Has Lost A Total Of 585-Days GCT. Offender Can Apply For Restoration Of GCT Based On The Number Of Programs Successfully Completed While On IMS: ACT/MOC – 30-Days; CD TX – 20-Days; CBCP/AYP – 10-Days; GCT Will Be Restored Sequentially Beginning With The First Infraction Where GCT Was Lost (5/4/12 633 60-Days). In Order To Be Eligible To Apply For GCT Restoration The Offender Has To Be One Year

Infraction Free. GCT Restored Cannot Exceed The Amount Of GCT Lost During The Current Incarceration. -\*Not Eligible For Restoration Until 1/31/2020.

#### Education/Employment Needs

##### Education/Employment Need

Needs Job Finding Skills And Support For Community Employment  
Needs Basic Skills Preparation  
Needs Vocational Training Program Of 6-12 Months

##### Narrative:

Jackson Was Terminated From A2A On 1/30/2018 But Has Been Placed Back Onto The List And Is Anticipated To Start In April. Completed His GED On 2/14/2018.

#### Programs

##### Program Name

Getting It Right (GIR)

##### Program Date

05/09/2019

##### Program Status

Assigned

Started  
GIR

#### Custody Score

##### Current Custody

Current Custody Score: 0

Maximum

##### Infraction Behavior

Infraction Behavior Score: 5

##### Program Behavior

Program Behavior Score: 2

Month	Year	Points	Non-Award Reason
July	2018	0	Offender Segregated
August	2018	0	Offender Segregated
September	2018	0	Offender Segregated
October	2018	0	Offender Segregated
November	2018	0	Offender Segregated
December	2018	0	Offender Segregated
January	2019	0	Offender Segregated
February	2019	1	
March	2019	1	
April	2019	0	Offender Segregated
May	2019	0	Offender Segregated
June	2019	0	Offender Segregated

#### Detainers

Detainer Score: 10

	Felony	ICE
Current	No	No
Potential	No	No

#### Escape History

Escape History Score: 15

## DOC

Escape Description

Month

Year

## Calculated Custody

Custody Score: 32

Calculated Custody: Close

**Expectations**

## Condition

Expectation	Frequency	Due Date	Complete
SOTP	As Available	12/29/2026	No
Obtain And Maintain MAX Level 4	As Required	12/29/2028	No
Remain Infraction Free	As Required	12/29/2028	No
-Refrain From Participating In STG Activities.	On-Going	12/29/2028	No

**LFO (Legal Financial Obligations)**

Cause	Amount
121003968	\$3,543.66
121005097	\$2,289.99
<b>Total:</b>	<b>\$5,833.65</b>

**Targeted Custody**

Targeted Date	Targeted Custody	Targeted Placement	Inmate Preferred Location
---------------	------------------	--------------------	---------------------------

**Disciplines**

Discipline	Other Discipline	Staff
Custody		Zavodny, Brian E
Intelligence / Investigations		Brady, Patrick E
Mental Health		Gillespie, Caroline

**Comments/Recommendations**

Submit/Review Name Date	Comments	Concur
06/06/2019 Irving, Leona L	(Offender) <u>Jackson did not participate in the development of this plan.</u> (Counselor) Prison admission 3/29/12 with current ERD of 7/6/29. Jackson was assigned Max custody 3/18/19 due to assault of another offender that occurred at another facility. 2 previous Max custody assignments due to similar behavior that has also helped to create safety concerns. He has demonstrated an inability to follow facility rules and <u>currently poses a threat to the secure operation of CBCC-IMU-F (IMS).</u> He has become <u>fixated on and is harassing a CBCC staff member</u> whose duties require their regular attendance and presence in the unit where he is housed. Separations at WSP-IMU-IMS and AHCC-R (unit), WSP-Main-R (quad); no current prohibitions and STG affiliations are noted. Recommendations: 1. Maintain Max custody. 2. Transfer to appropriate IMU.	



06/06/2019	Bannan, Barbara F	(FRMT) I concur with the MDT FRMT recommendation to 1. Maintain Max custody. 2. Transfer to appropriate IMU. <u>Request for a prohibited placement for CBCC has been requested and is pending decision.</u>	Yes
06/10/2019	Adamire, Vance W	Jackson has a history of violence towards staff when he becomes fixated on them. He is currently <u>displaying a fixation on a staff whose duties require their presence in his assigned unit.</u> This fixation on staff has impacted their ability to conduct their duties. Maintain MAX Custody and Transfer to another IMU.	Yes
07/16/2019	Pfaff, Ryan A	Jackson was assigned Max custody in March 2019 due to his assault on another offender. While assigned Max custody he has remained infraction free, is level 4 and <u>was programing in GIR prior to being transferred from CBCC-IMU when he was fixated on a staff member.</u> It is reported he has an infraction pending. He has 2 prior Max custody placements. Recommendation: Maintain Max, transfer to SCCC-IMU, maintain level 4 and complete GIR.	Yes
07/19/2019	Kaech, Casey M	07/18/2019 MAX CUSTODY MDT: Maintain Maximum (MAX) Custody, Transfer to SCCC-IMU. Update BPP. Obtain and maintain level 4. Screen for appropriate programming and DBT. ATTENDEES: T. Thrasher-Assoc. Sup. SCCC- CHAIR; K. Bowen-OCML; D. Feist-CBCA; K. Neva-INV2; C. Kaech-SS; R. Pfaff-CS3; L. Fletcher-PS4; J. Smith- Project Manager; A. Deshev-CMHUS; J. Uglick- AA2; J. McCollum-CUS; G. Newman-CUS; J. Scott-CS3.	Yes

### Assigned Custody

Calculated Custody:	Assigned Custody:	Override Reason:	Override Narrative:
Close	Maximum	Intensive Management Status	Maintain Max Custody In Order To Complete All Requirements.
	Classification Status:	Completion Date:	Custody Assigned By:
	In-Effect	07/19/2019	Casey Kaech, Secretary Senior

**DOC:** 355949 **Name:** JACKSON, Kyntrel Trevyone

Attachment  
Grievance 13671601-1 page

5

SENT COPY

JAN 24 2019

LOG I.D. NUMBER

19671601



## OFFENDER COMPLAINT

CHECK ONE: ☒ Initial Grievance ☐ Emergency Grievance ☐ Appeal to Next Level ☐ Rewrite

**RESIDENTIAL FACILITIES:** Send completed form to the Grievance Coordinator. Explain what happened, when, where, and who was involved or which policy/procedure is being grieved. Be as brief as possible, but include the necessary facts. You may use only one complaint form. A formal grievance begins on the date the typed grievance forms are signed by the Coordinator. Contact staff to report an emergency situation or to initiate an emergency grievance. Please attempt to resolve all complaints through appropriate staff before initiating a grievance.

**NOTE:** Complaints must be filed within 20 working days of the incident. Appeals must be filed within 5 working days of receiving the response. Include log ID # on rewrite or response being appealed.

Last Name	First	Middle	DOC Number	Facility/Office	Unit/Cell
Jackson	Kyntrel	Trevone	355949	W.S.P	MH-05

**COMMUNITY SUPERVISION:** Send completed copies of this form directly to: Grievance Program Manager, Offender Grievance Program, Department of Corrections, P.O. Box 41129, Olympia WA 98504-1129.

MAILING ADDRESS: STREET OR P.O. BOX	CITY, STATE	ZIP CODE	TELEPHONE
-------------------------------------	-------------	----------	-----------

**I WANT TO GRIEVE:** I am being retaliated against by IMU South C.U.S Scott Buttice, 2nd Shift Sergeant John Bennett, CPM Steven Sundberg, & Tim Trasher over legal actions by them taking my property, leaving me in an empty cell for 8 plus hours, then moving me to IMU North without my T.V as I was level 4. This is clear retaliation & done with the intent to harass me over my legal actions. Once in north they made sure my cell MH-05 had no table which shows their clear intent to burden my legal & grievance process. This affects me by causing me numerous undue burdens for no reason besides harassment.

This is a employee conduct grievance

**SUGGESTED REMEDY:**  
stop harassing me

Mandatory Kyntrel Jackson  
Signature

1-22-19  
Date

## GRIEVANCE COORDINATOR'S RESPONSE

Your complaint is being returned because:

- ☒ It is not a grievable issue.  
☐ You requested to withdraw the complaint.  
☐ You failed to respond to callout (sheet) on \_\_\_\_\_  
☐ Administratively Withdrawn \_\_\_\_\_  
☐ The formal grievance/appeal paperwork is being prepared.

Facility/Office

Date Received

WSP

1-24-19

- ☐ The complaint was resolved informally.  
☐ Additional information and/or rewriting needed.  
 (See below.) Return within 5 working days or by: \_\_\_\_\_  
☐ No rewrite received \_\_\_\_\_  
☐ Sent to \_\_\_\_\_ (facility) on \_\_\_\_\_ (date).

## EXPLANATION:

You were moved to IMU North for your safety and until you are moved to close custody. The concerns for your safety arise from your repeated claims of retaliation by IMU South staff. Your housing is a classification decision and cannot be grieved.

Coordinator's Name (print)  
J. Aiyeku CS2

Coordinator's Signature

[Signature]

Date  
1/25/2019



Attachment 6  
Attempt to appeal CFP-2 pages



OFFENDER'S KITE

## PAPELETA DE PETICIÓN DEL INTERNO

OFFENDER NAME (PRINT) NOMBRE DEL INTERNO (LETRA DE MOLDE)

Kuntrel Jackson

DOC NUMBER/NÚMERO DOC

FACILITY, UNIT, CELL/FACILITY IS  
INSTALACIÓN/UNIDAD, CELDA

DATE/FECHA

355949

TMA B-102

7-23-19

DESIRE INTERVIEW WITH OR ANSWER FROM/DESEA ENTREVISTA CON O RESPUESTA DE

Ad-Seg Scott (CFP Appeal)

☐ Interpreter needed for \_\_\_\_\_ (language).☐ Necesito intérprete para \_\_\_\_\_ (idioma).

REASON/QUESTION

RAZÓN/PREGUNTA

I wish to appeal my CFP due to false allegations of me becoming fixated on a CBCC staff member (without an infraction) & being transferred from CBCC & forced to restart my OCP at SCCC over this. I did nothing wrong & simply filed proper & legal action against the CBCC employee. Thus I request that I be released from TMA to WCC-Cedar Hall.

SIGNATURE/FIRMA

DAYS OFF/DÍAS LIBRES

RESPONSE

RESPUESTA

Please see ATTACHED for proper way to Appeal Classification

RESPONDER/PERSONA QUE RESPONDE

DATE/FECHA

Albertson

7-24-19

Distribution: WHITE/YELLOW-Responder, YELLOW-Return to Offender with Response, PINK-Offender keeps  
Distribución: BLANCA/AMARILLA-Persona que responde, AMARILLA-Devuelva al interno con respuesta,  
ROSA-Interno

DOC 21-473 E/S (Rev. 05/23/13)

DOC 390.585, DOC 450.500

If you wish to appeal Headquarters' classification decision, send a written notice via U.S. mail, in an envelope clearly marked "Classification Appeal" to: Administrator – Classification and Case Management, P.O. Box 41149 Olympia, WA 98504-1149.

**Note: Classification decisions cannot be appealed until AFTER Headquarters has made a classification decision. Offenders can appeal Custody assignment, NOT facility placement.**

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Continued Attachment 1



**B102**

OFFENDER'S KITE

**PAPELETA DE PETICIÓN DEL INTERNO**

OFFENDER NAME (PRINT) NOMBRE DEL INTERNO (LETRA DE MOLDE)		
Kintrel Jackson		
DOC NUMBER/NÚMERO DOC	FACILITY, UNIT, CELL/FACILITY IS INSTALACIÓN/UNIDAD, CELDA	DATE/FECHA
255949	IMU B-102	8-2-19
DESIRE INTERVIEW WITH OR ANSWER FROM/DESEA ENTREVISTA CON O RESPUESTA DE		
Ad-Seg Scott		

REASON/QUESTION  
RAZÓN/PREGUNTA

☐ Interpreter needed for \_\_\_\_\_ (language).  
☐ Necesito intérprete para \_\_\_\_\_ (Idioma).

As to HQ can't figure out what to do with me, I ask if I can please provide input. Since January I have not been infraacted, have been good while here, & the OCP class (Getting it Right) that I was actively participating in ends 8-2-19. I thus ask to please be released to WCC-Cedar Hall, I am willing to be released under contract & partake in a OCP class out there. Please & Thank You

SIGNATURE/FIRMA

DAYS OFF/DÍAS LIBRES

RESPONSE  
RESPUESTA

You currently have pending infractions. HQ makes the final decisions regarding custody level and next facility placement. When you get to your next facility work with your assigned counselor regarding the request above.

RESPONDER/PERSONA QUE RESPONDE

DATE/FECHA

Scott

8/6/19

Distribution: WHITE/YELLOW-Responder, YELLOW-Return to Offender with Response, PINK-Offender keeps  
 Distribución: BLANCA/AMARILLA-Persona que responde, AMARILLA-Devuelva al interno con respuesta, ROSA-interno

DOC 21-473 E/S (Rev. 05/23/13)

DOC 390.585, DOC 450.500

**B102**

OFFENDER'S KITE

**PAPELETA DE PETICIÓN DEL INTERNO**

OFFENDER NAME (PRINT) NOMBRE DEL INTERNO (LETRA DE MOLDE)

Kuntrel Jackson

DOC NUMBER/NÚMERO DOC

FACILITY, UNIT, CELL/FACILITY IS  
INSTALACIÓN/UNIDAD, CELDA

DATE/FECHA

255949IMU B-1028-2-19

DESIRE INTERVIEW WITH OR ANSWER FROM/DESEA ENTREVISTA CON O RESPUESTA DE

C.I.S French☐ Interpreter needed for \_\_\_\_\_ (language).☐ Necesito intérprete para \_\_\_\_\_ (Idioma).

REASON/QUESTION

RAZÓN/PREGUNTA

As to HQ is still trying to figure out what to do with  
me & hopefully reviewing my appeal for release to  
Cedar Hall, I also wish to make a plea with you. Since  
my January infraction I have not been inflected, did  
partake in GTR at Clallam Bay & the class I was in end  
today 8-2-19, & my behavior here has been good. I thus ask  
to please be released to WCC-Cedar Hall & partake in an OCP  
there. I am willing to be released under contract.

SIGNATURE/FIRMA

DAYS OFF/DÍAS LIBRES

RESPONSE

RESPUESTA

I understand, but unfortunately WCC  
IMU has no control over your  
placement or classification.  
Has stated that you have already  
appealed your classification decision  
to HQ? correct?

RESPONDER/PERSONA QUE RESPONDE

DATE/FECHA

IMU8-1-19

Distribution: WHITE/YELLOW-Responder, YELLOW-Return to Offender with Response, PINK-Offender keeps  
 Distribución: BLANCA/AMARILLA-Persona que responde, AMARILLA-Devuelva al Interno con respuesta,  
 ROSA-Interno

DOC 21-473 E/S (Rev. 05/23/13)

DOC 390.585, DOC 450.500

Attachment 7

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Appeal to HQ Classification - 2 pages



Dear HQ,

July 22<sup>nd</sup>, 2019

I wish to appeal the false & slandering CFP decision filed against me by CBCC employees claiming I became fixated on a CBCC staff member & claiming due to this (false) fixation that they decided to remove me from CBCC & force me to fully re-start my OCP class. What really happened is on April 16<sup>th</sup>, 2019 illegal action was taken against me by Psychology associate Heidi L. Romero (before that date we had no prior incidents). Due to the illegal actions taken against me, I took proper & legal action pursuant to the Federal Rules of Bankruptcy Procedure & sent a legal & notarized (by a CBCC employee) Bill to Romero to pay the monetary fines for the illegal acts she committed against me (Attachment 1 is a true copy of the legal & notarized documents I sent Heidi Romero which details the issues that happened on 4-16-19). During the time of April 16<sup>th</sup>, 2019 to current I never spoke, talked, & even looked at Heidi L. Romero & simply stuck to handling everything through the proper legal channels. The only reason the court hasn't been involved is because CBCC is/was denying me the initial Bankruptcy petition forms which is currently pending in Federal court in the Western District, case No. 3:19-cv-05475-RBL-JRC. I have continued to show respect towards all CBCC staff & once an issue arose between me &

CBCC employee Romero rather than get violent as I use to do as a child, I decided to resolve the issue through the proper legal channels for the violations & illegal acts taken against me by Heidi L. Romero & if she believes she's innocent than she can dispute my claims in Bankruptcy court as to I will be pursuing legal action once I recieve the Bankruptcy forms.

Thus due to the above it was unfair for CBCC to remove me from my required programing in GIR which I was actively partaking in. They are now forcing me to re-start an entire OCP at SCCC which will result in extending my IMS program in isolation.

I thus respectfully ask to be released from IMU to WCC-Cedar Hall & partake in a class out there. Since my January 2019 infraction I have recieved no infractions since, did partake in GIR & only had one negative log entry for signing in April. Since January there have been multiple STG riots & due to the amount of people involved it would be best to release <sup>me</sup> as to I will do good in Cedar Hall.

Kyntrel Jackson/Sinister Daevayasnam God

Attachment 8  
Grievance 19683388-1 page





LOG I.D. NUMBER

## OFFENDER COMPLAINT

CHECK ONE: ☒ Initial ☐ Emergency ☐ Appeal ☒ Rewrite

**RESIDENTIAL FACILITIES:** Send completed form to the Grievance Coordinator. Explain what happened, when, where, and who was involved or which policy/procedure is being grieved. Be as brief as possible, but include the necessary facts. Use only or complaint form. A formal grievance begins on the date the typed grievance forms are signed by the Coordinator. Contact a Department employee to report an emergency situation or to initiate an emergency complaint. Please attempt to resolve all complaints through the appropriate Department employee(s) before pursuing a grievance.

**NOTE:** Complaints must be filed within 20 working days of the incident. Appeals must be filed within 5 working days of receiving the response. Include log ID # on rewrite or response being appealed.

Last Name	First	Middle	DOC Number	Facility/Office	Unit/Cell
Jackson	Kuntrel	Trevyone	355949	WCC	IMU B-102

**COMMUNITY SUPERVISION:** Send completed copies of this form directly to: Grievance Program Manager, Offender Grievance Program, Department of Corrections, P.O. Box 41129, Olympia WA 98504-1129.

MAILING ADDRESS: STREET OR P.O. BOX	CITY STATE	ZIP CODE	TELEPHONE
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**COMPLAINT:** ~~I wish to appeal my July 13th, 2019 Custody Facility Plan (CFP) Classification & transfer. I was transferred to WCC on June 12, 2019 based off a CFP submitted on me for becoming fixated on, & harassing a CBCC staff member in which I was never recieved a hearing or notice on. The transfer decision was unconstitutional & a violation of my 1st Amendment rights to redress government without retaliation as to this false fixation is based on legal actions against Heidi L. Romero.~~ I wish to appeal my July 13th, 2019 Custody Facility Plan (CFP) Classification & transfer. I was transferred to WCC on June 12, 2019 based off a CFP submitted on me for becoming fixated on, & harassing a CBCC staff member in which I was never recieved a hearing or notice on. The transfer decision was unconstitutional & a violation of my 1st Amendment rights to redress government without retaliation as to this false fixation is based on legal actions against Heidi L. Romero.

P.S) I filed a similar grievance under #19671601 where they said housing was a classification issue & non grievable but this is a grievance on facility placement & I don't know if this is the same.

## SUGGESTED REMEDY:

Appeal my classification & release to general population at WCC Cedar Hall

Mandatory Kuntrel Jackson 7-28-19  
Signature Date

## GRIEVANCE COORDINATOR'S RESPONSE

Your complaint is being returned because:

- ☒ It is not a grievable issue.  
☐ You requested to withdraw the complaint.  
☐ You failed to respond to callout (sheet) on \_\_\_\_\_.  
☐ Administratively Withdrawn \_\_\_\_\_.  
☐ The formal grievance/appeal paperwork is being prepared.  
☐ Not accepted

Facility/Office

WCC IMU

Date Received

7/30/19

- ☐ The complaint was resolved informally.  
☐ Additional information and/or rewriting needed. (See below.)

Return within 5 working days or by: \_\_\_\_\_

- ☐ No rewrite received \_\_\_\_\_  
☐ Sent to \_\_\_\_\_ (facility) on \_\_\_\_\_ (date).

## EXPLANATION:

Facility placement is a classification action & is not grievable.

Coordinator's Name (print)

Kerri McTarsney CSII

Coordinator's Signature

Kerri McTarsney

Date

7/30/19

Attachment 9

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Grievance 19683388 Appeal to HQ - 1 page

Dear Grievance Program Manager,

August 2<sup>nd</sup>, 2019

I filed grievance 19683388 on July 28<sup>th</sup>, 2019 & on July 30<sup>th</sup>, 2019 I recieved a responce back from CS2 Kerri McTarsney stating it wasn't a grievable issue because "Facility placement is a classification action & is not grievable". I wish to appeal this decision to you in good faith as an attempt to exhaust my administrative remedies on this issue & due to I want to be 100% certain that D.O.C considers this a non grievable issue.

Respectfully,

Sinister Daevayasnam God



**IV. RELIEF**

State exactly what you want the Court to do for you. For example, you may be seeking money damages from an individual defendant, you may want the Court to order a defendant to do something or to stop doing something, or you may want both kinds of relief. Make no legal arguments. Cite no cases or statutes.

~~\$\$500 per day in isolation past 8-9-19, payment of costs & expenses, \$19,000 for 38 days on isolation hold at WCC, \$125,000 for 1st Amendment violation, \$30,000 for 14th Amendment violation, \$15,000 for 6th Amendment violation, (See Attached)~~

**V. SIGNATURE**

By signing this complaint, you represent to the Court that you believe the facts alleged to be true to the best of your knowledge, that you believe those facts show a violation of law, and that you are not filing this complaint to harass another person or for any other improper purpose.

August 5<sup>th</sup>, 2019  
Dated

Sinister Daevayasnam God (Kyntrel Jackson)  
Plaintiff's Signature

#### IV. Relief Continued

\$5,000 for payment of property transfers, return of all denied property due to transfer, \$2,000 for each conspire against rights & state law violations, & Refer all defendants employeeed with the Assistant Attorney Generals Office to the disciplinary committee at the Washington State Bar Association, payment of attorney fees.

We will notify the court of the day the plaintiff is released from isolation, so as to cap the \$500 per day after August 9<sup>th</sup>, 2019.